

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas

FILED

April 14, 2024

Nathan Ochsner, Clerk of Court

United States of America

v.

Samuel H. Juarez

YOB: 2004 COB: USA

Case No. M-24-0622-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 14, 2024 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

31 U.S.C. § 5332

Attempted to Bulk Cash Smuggle out of the United States in the amount of
\$85,000

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

Approved by AUSA Robert Guerra

Submitted by reliable electronic means, sworn to
and attested to telephonically per Fed. R. Cr. 4.1,
and probable cause found on:

Date: 04/14/2024 10:52 pm

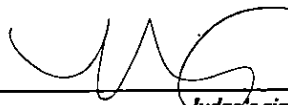
City and state: McAllen, Texas

/s/ Krystian Sanchez

Complainant's signature

Krystian Sanchez, HSI Special Agent

Printed name and title



Judge's signature

Nadia S. Medrano, US Magistrate Judge

Printed name and title

Attachment A

1. The purpose of this affidavit is in support of a complaint to arrest Samuel Humberto JUAREZ, a United States Citizen, for violations of 31 USC 5332 (a)(1) (Bulk cash smuggling into or out of the United States) The information in this affidavit is based on personal knowledge and information provided to me by other law enforcement officers and individuals. The information in this affidavit is provided for the limited purpose of establishing probable cause. The information is not a complete statement of all the facts related to this case.
2. On April 14, 2024, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection (CBP) Office of Field Operations at the Pharr Port of Entry (POE) in Pharr, Texas. At 11:47 am, CBP Officers (CBPOs) encountered Samuel Humberto JUAREZ (hereafter referred to as JUAREZ), a citizen of the United States, while attempting to exit the U.S. with approximately \$85,000 concealed within an aftermarket compartment of the vehicle he was driving. JUAREZ was attempting to exit the United States through the Pharr, Texas Port of Entry operating a silver in color Dodge Nitro. The vehicle was registered to JUAREZ. CBPOs obtained a negative declaration from JUAREZ for firearms, ammunition, and currency in excess of \$10,000 US dollars.
3. At the Pharr Port of Entry, CBPOs referred JUAREZ to a secondary inspection. During the secondary inspection, CBP officers conducted an X-ray examination of the Dodge Nitro and observed "anomalies in a man-made compartment in the rear cargo area of the vehicle". A further inspection revealed approximately \$85,000 in three vacuum sealed packages within the aftermarket compartment of the vehicle.
4. Homeland Security Investigations (HSI) Special Agent (SA) Sanchez responded to the Pharr POE to assist in the investigation. SA Sanchez advised JUAREZ of his Miranda warning in Spanish. JUAREZ read the Miranda forms out loud and waived his right, both verbally and in writing and spoke to SA Sanchez. Federal law enforcement interviewed JUAREZ, who stated that he knowingly transported what he believed to be money hidden in his vehicle.
5. During the interview, Juarez admitted that he was transporting what he believed to be a large amount of currency out of the United States. JUAREZ acknowledged that he was aware when entering or exiting the United States travelers must declare large amounts of currency.